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Electronically Filed 12/27/11

5 Attorney for United Central Bank
6 a Texas state bank

7 Counsel Designated for Service of
7 Papers Per LR 10-1(b)

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10 Las Vegas Nevada 89102

11 UNITED STATES BANKRUPTCY COURT

12 DISTRICT OF NEVADA

13 NORTHERN DIVISION

14 In Re:) CASE NO. 3:11-bk-53706-btb
15) Chapter 11
16)
17 DHILLON GROUP, LLC)
18 dba Holiday Inn Express) OBJECTION OF UNITED CENTRAL
18 2902 Michelle Dr.) BANK TO DECLARATION OF
18 Sherman, TX 75092) JAGMOHAN DHILLON IN SUPPORT
19) OF DEBTOR'S OPPOSITION TO
19 Debtor) SECURED CREDITOR'S MOTION
19) FOR DISMISSAL FOR IMPROPER
19 VENUE

20 Date: January 3, 2012
21 Time: 2:00 p.m.
21 Est. Time: 30 Mins.

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24 United Central Bank objects to the Declaration of Jagmohan Dhillon in Support of Debtor's
25 Opposition to Secured Creditor's Motion for Dismissal for Improper Venue (Doc 32) as follows:

26 1. Paragraph 2:

27 Best Evidence Objection - There is no documentation attached which establishes Mr.
28 Dhillon as the managing member. See also, Exh. O to the Request for Judicial Notice filed

1 concurrently herewith.

2 2. Paragraph 4:

3 Best Evidence Objection. There is no documentation attached which establishes Mr.
4 Dhillon as the managing member. See also, Exhs. A and B to the Request for Judicial Notice filed
5 concurrently herewith.

6 3. Paragraph 5:

7 Improper Opinion: The statement regarding the “never center” of the debtor is a
8 statement of opinion, not of fact.

9 Legal Conclusion: The location of the principal place of business is a legal
10 conclusion.

11 Best Evidence Objection: The documents relating to the business of the debtor would
12 be the best evidence of its “nerve center”.

13 4. Paragraph 8:

14 Improper Opinion: The statement regarding the “never center” of the debtor is a
15 statement of opinion, not of fact.

16 Legal Conclusion: The location of the principal place of business is a legal
17 conclusion.

18 Best Evidence Objection: The documents relating to the business of the debtor would
19 be the best evidence of its “nerve center”.

20 5. Paragraph 11:

21 Improper Opinion: The statement regarding the “never center” of the debtor is a
22 statement of opinion, not of fact.

23 Legal Conclusion: The location of the principal place of business is a legal
24 conclusion.

25 Best Evidence Objection: The documents relating to the business of the debtor would
26 be the best evidence of its “nerve center”.

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1 6. Paragraph 12:

2 Irrelevant. The term “located” has no meaning in this context.

3 7. Paragraph 13:

4 Improper Opinion: The statement regarding the “never center” of the debtor is a
5 statement of opinion, not of fact.

6 Best Evidence Objection: The documents relating to the business of the debtor would
7 be the best evidence of where its activities are coordinated.

8 8. Paragraph 14:

9 Improper Opinion: The statement regarding the “never center” of the debtor is a
10 statement of opinion, not of fact.

11 Best Evidence Objection: The documents relating to the business of the debtor would
12 be the best evidence of the location of its books.

13 9. Paragraph 15:

14 Irrelevant.

15 10. Paragraph 16:

16 Improper Opinion: The statement regarding the ability of the debtor to function in
17 a specific location is a statement of opinion, not of fact. .

18 11. Paragraph 18:

19 Irrelevant.

20 12. Paragraph 19:

21 Irrelevant.

22 Not a statement of fact.

23 13. Paragraph 20

24 The referenced documents were not attached to the Declaration of Mr. Dhillon and
25 thus are not part of the record before the Court.

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1 14. Paragraph 19:

2 Irrelevant.

3 Not a statement of fact.

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6 DATED: December 27, 2011

/s/ George C. Lazar

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1 CERTIFICATE OF SERVICE

2 On December 27, 2011, a true and correct copy of the attached document was served as
3 follows:

4 By the Court's ECF System (Local Rule 5005(c)):

5 A.J. KUNG on behalf of Debtor DHILLON GROUP, LLC
ajkung@ajkunglaw.com, bbrown@ajkunglaw.com; paralegal7@ajkunglaw.com;
6 paralegal4@ajkunglaw.com; paralegal5@ajkunglaw.com; paralegal3@ajkunglaw.com;
fileclerk@ajkunglaw.com; paralegal1@ajkunglaw.com

7 U.S. TRUSTEE - RN - 11 USTPRegion17.RE.ECF@usdoj.gov

8

9 By U.S. Mail:

10 A copy of the attached document was placed in addressed envelope(s) and the envelope(s)
11 containing the document were placed into the U.S. Postal Service mail on December 27, 2011 at
San Diego, California; copies were mailed to:

12 None

13 I declare under penalty of perjury under the laws of the United States that the foregoing is
14 true and correct.

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17 DATED: December 27, 2011

18 /s/ George C. Lazar

19 George C. Lazar

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